

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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**CHIARA MEATELLI,**

Petitioner,

CASE NO. 1:20-MC-00033-SJB

v.

**GOOGLE LLC d/b/a YOUTUBE**

Respondent.

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C. Christopher Newberg (P79025)  
RODENHOUSE LAW GROUP P.C.  
Attorney for Petitioner  
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**AMENDED DECLARATION OF C. CHRISTOPHER NEWBERG IN SUPPORT OF  
ISSUANCE OF SUBPOENA PURSUANT TO 17 U.S.C. § 512(h)**

I, C. Christopher Newberg, the undersigned, declare that:

1. My law firm, Rodenhouse Law Group PC, has been retained by Chiara Meattelli to effectuate the takedown of infringing content from YouTube.com and discover the identifies of the part(y)(ies) responsible for distributing the infringing content.

2. I am requesting the issuance of the proposed subpoena that would order YouTube to disclose the identity, including the name, physical address(es), IP address(es), telephone number(s), email address(es), payment information, account updates, and account history(y)(ies) of the users responsible for uploading and distributing the content made available on the following pages and URLs:

ChiarAss MeattelLicker – Channel Page (featuring images owned by Ms. Meattelli)  
[https://www.youtube.com/channel/UCkE\\_jVbv0ek3eJtvbuINt\\_Q/featured](https://www.youtube.com/channel/UCkE_jVbv0ek3eJtvbuINt_Q/featured)

ChiarAss MeattelLicker - The Trump O Mouth  
<https://www.youtube.com/watch?v=rwFXgEVt2yk>

ChiarAss MeattelLicker - L'ossessione per l'ossessione  
<https://www.youtube.com/watch?v=R7z4V10tg6g>

ChiarAss MeattelLicker & Nino Tancelo – ChiarAss  
<https://www.youtube.com/watch?v=5rDVNzYepYo>

ChiarAss MeattelLicker Show  
<https://www.youtube.com/watch?v=Vc3uGN9CsV8>

ChiarAss MeattelLicker - My name is ChiarAss MeattelLicker  
[https://www.youtube.com/watch?v=5T\\_H8d0QYrQ](https://www.youtube.com/watch?v=5T_H8d0QYrQ)

ChiarAss MeattelLicker - The Witch  
<https://www.youtube.com/watch?v=xNHgh1ALYpU>

ChiarAss MeattelLicker - Surfing with the Trumps  
<https://www.youtube.com/watch?v=ZQBfQTiNKio>

ChiarAss MeattelLicker - Il giorno prima  
<https://www.youtube.com/watch?v=vTTIj9Xbqyo>

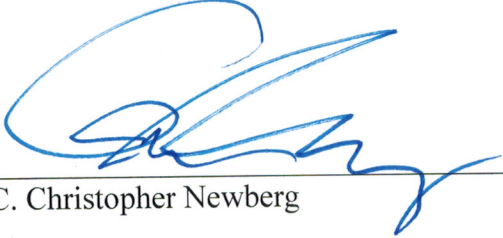
ChiarAss MeattelLicker – Surreale  
[https://www.youtube.com/watch?v=\\_16KhGvXJpI](https://www.youtube.com/watch?v=_16KhGvXJpI)

ChiarAss MeattelLicker - Witchery  
<https://www.youtube.com/watch?v=ecJXS2ylLdY>

3. The purpose for which this subpoena is sought is to obtain the identity or identity of the individual or individuals who created, uploaded, and/or distributed Ms. Meattelli's copyrighted images and videos without her authorization. This information will only be used for the purposes of protecting the rights granted to Ms. Meattelli under Title II of the Digital Millennium Copyright Act.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 8, 2020



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C. Christopher Newberg